



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

100 CHURCH STREET  
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT  
*Acting Corporation Counsel*

DAVID S. THAYER  
*Assistant Corporation Counsel*  
t: (212) 356-2649  
f: (212) 356-1148  
e: dthayer@law.nyc.gov

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***Via ECF***

The Honorable Edgardo Ramos  
United States District Court for the  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: **Nampiarampil v. N.Y.C. Campaign Fin. Bd., et al.**  
**No. 23 CV 6391 (ER)**

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the office of the Acting Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for Defendants in the above-referenced action. With Plaintiff's consent, I write to respectfully request a 1-week extension, to September 20, 2024, of Defendants' time to move to dismiss in this action.

As the Court is aware, yesterday, on the eve of Defendants' filing their motion to dismiss, Plaintiff filed a document that she denominated a motion to amend/correct. After preliminarily conferring with my clients and a review of the document, it appears that Plaintiff's filing amplifies or otherwise mirrors portions of the First Amended Complaint. Defendants would therefore like to address it in their moving papers. In order to adequately do so, however, further discussion with my clients is necessary.

As such, I respectfully request a 1-week extension, to September 20, 2024, of Defendants' deadline to move to dismiss. This corresponds as well with the deadline just set by the Court in connection with Plaintiff's recent filing. Such an extension would adjust the briefing schedule as follows:

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
Defendants' moving papers due	September 13, 2024	September 20, 2024
Plaintiff's opposition papers due	October 11, 2024	October 18, 2024
Defendants' reply papers due	October 18, 2024	October 25, 2024

This is Defendants' second request for an extension of the briefing schedule of their motion to dismiss the First Amended Complaint, the first having been granted on August 15, 2024. (ECF No. 54.) As noted, Plaintiff has graciously consented to this application.

I thank the Court for its consideration of this application.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer